

LATHAM & WATKINS LLP
Peter A. Wald (Bar No. 85706)
James K. Lynch (Bar No. 178600)
Timothy L. O'Mara (Bar No. 212731)
Elissa J. Germaine (Bar No. 219195)
505 Montgomery Street, Suite 2000
San Francisco, California 94111-2562
Telephone: (415) 391-0600
Facsimile: (415) 395-8095

****E-filed 7/5/05****

Attorneys for Defendant
ERNST & YOUNG LLP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DANIEL SPRINGER,

Plaintiff,

v.

ERNST & YOUNG LLP; THOMAS C.
TRAUGER; OLIVER G. FLANAGAN;
MICHAEL MULLEN; and DOES 1 through
20, inclusive,

Defendants.

CASE NO. C 05-00025 JF

**STIPULATION AND [PROPOSED] ORDER
RESCHEDULING CASE MANAGEMENT
CONFERENCE**

Date:
Time:
Place: Courtroom 3, 5th Floor
Judge: Hon. Jeremy Fogel

1 Defendant Ernst & Young LLP, Defendant Michael Mullen, Defendant Thomas
2 Trauger and Plaintiff Daniel Springer, through their respective counsel of record, subject to the
3 Court's approval, hereby STIPULATE AS FOLLOWS:

4 1. WHEREAS Plaintiff Springer filed a Motion to Remand, which is
5 currently under submission;

6 3. WHEREAS a Case Management Conference is currently scheduled for
7 July 8, 2005;

8 4. WHEREAS, the parties agree that, to avoid the possible waste of judicial
9 resources, the Case Management Conference should be continued to August 19, 2005, and the
10 deadlines relating to the Case Management Conference be deferred and correspond to the new
11 date for the Case Management Conference (i.e., the deadline for the Federal Rule of Civil
12 Procedure 26(f) conference will be July 29, 2005 and the deadline for the Case Management
13 Statement and Initial Disclosures will be August 12, 2005);

14 NOW, THEREFORE,

15 5. The parties respectfully request that the Case Management Conference be
16 rescheduled for August 19, 2005.

17 ///

18
19
20
21
22
23
24
25
26
27
28

6. The parties also respectfully request that the deadlines relating to the Case Management Conference be deferred and correspond to the new date for the Case Management Conference as provided in this stipulation.

IT IS SO STIPULATED.

Dated: June 22, 2005

Respectfully submitted,
LATHAM & WATKINS LLP

/S/

James K. Lynch

PETER A. WALD
JAMES K. LYNCH
ELISSA J. GERMAINE
505 Montgomery Street, Suite 1900
San Francisco, CA 94111-2562
Tel: (415) 391-0600
Fax: (415) 395-8095
Attorneys for Defendants Ernst & Young LLP

Dated: June 22, 2005

HIGHMAN, HIGHMAN & BALL

Lawrence Ball

LAWRENCE BALL
BRUCE J. HIGHMAN
870 Market Street, Suite 467
San Francisco, CA 94102
Telephone: (415) 982-5563
Fax: (415) 982-5202
Attorneys for Plaintiff Daniel Springer

Dated: June 22, 2005

ROGERS JOSEPH O'DONNELL & PHILLIPS

Thomas D. Blanford

PATRICIA A. MEAGHER
THOMAS D. BLANFORD
311 California Street
San Francisco, CA 94104
Telephone: (415) 956-2828
Fax: (415) 956-6457
Attorneys for Defendant Michael Mullen

FROM LATHAM & WATKINS LLP Fax Machine #2

(WED) 6.22'05 10:59/ST. 10:56/NO. 4861909048 P 8

1 6. The parties also respectfully request that the deadlines relating to the Case
2 Management Conference be deferred and correspond to the new date for the Case Management
3 Conference as provided in this stipulation.

4 IT IS SO STIPULATED.

5
6 Dated: June 22, 2005

Respectfully submitted,
LATHAM & WATKINS LLP

7
8 /S/

James K. Lynch

9 PETER A. WALD
10 JAMES K. LYNCH
11 ELISSA J. GERMAINE
12 505 Montgomery Street, Suite 1900
13 San Francisco, CA 94111-2562
14 Tel: (415) 391-0600
15 Fax: (415) 395-8095
16 Attorneys for Defendants Ernst & Young LLP

17
18 Dated: June 22, 2005

HIGHMAN, HIGHMAN & BALL

19
20 
21 Lawrence Ball

22 LAWRENCE BALL
23 BRUCE J. HIGHMAN
24 870 Market Street, Suite 467
25 San Francisco, CA 94102
26 Telephone: (415) 982-5563
27 Fax: (415) 982-5202
28 Attorneys for Plaintiff Daniel Springer

Dated: June 22, 2005

ROGERS JOSEPH O'DONNELL & PHILLIPS

29 Thomas D. Blanford

30 PATRICIA A. MEAGHER
31 THOMAS D. BLANFORD
32 311 California Street
33 San Francisco, CA 94104
34 Telephone: (415) 956-2828
35 Fax: (415) 956-6457
36 Attorneys for Defendant Michael Mullen

6. The parties also respectfully request that the deadlines relating to the Case Management Conference be deferred and correspond to the new date for the Case Management Conference as provided in this stipulation.

IT IS SO STIPULATED.

Dated: June 22, 2005

Respectfully submitted,
LATHAM & WATKINS LLP

/S/

James K. Lynch

PETER A. WALD
JAMES K. LYNCH
ELISSA J. GERMAINE
505 Montgomery Street, Suite 1900
San Francisco, CA 94111-2562
Tel: (415) 391-0600
Fax: (415) 395-8095
Attorneys for Defendants Ernst & Young LLP

Dated: June 22, 2005

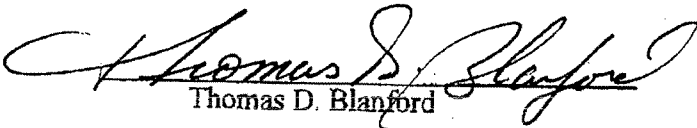
HIGHMAN, HIGHMAN & BALL

Lawrence Ball

LAWRENCE BALL
BRUCE J. HIGHMAN
870 Market Street, Suite 467
San Francisco, CA 94102
Telephone: (415) 982-5563
Fax: (415) 982-5202
Attorneys for Plaintiff Daniel Springer

Dated: June 22, 2005

ROGERS JOSEPH O'DONNELL & PHILLIPS


Thomas D. Blanford

PATRICIA A. MEAGHER
THOMAS D. BLANFORD
311 California Street
San Francisco, CA 94104
Telephone: (415) 956-2828
Fax: (415) 956-6457
Attorneys for Defendant Michael Mullen

FROM LATHAM & WATKINS LLP Fax Machine #2

(WED) 6.22'05 11:01/ST. 10:56/NO. 4861909048 P 9

1 Dated: June 22, 2005

SWANSON & McNAMARA LLP

2
3 
Alexis Haller


4 EDWARD W. SWANSON
5 ALEXIS HALLER
6 300 Montgomery Street, Suite 1100
7 San Francisco, CA 94104
8 Telephone: (415) 477-3800
9 Fax: (415) 477-9010
Attorneys for Defendant Thomas Trauger

10 **ORDER**

11 Pursuant to the above stipulation of the parties, and good cause appearing, IT IS
12 SO ORDERED that the Case Management Conference shall be rescheduled for August 19, 2005.

13 Dated 7/5/05

14 /s/electronic signature authorized

15 
The Honorable Jeremy Fogel
United States District Court Judge

16 SP519554.1